

Mr. Carl Muehlman
Avery Dennison MFD
650 West 67th Avenue
Scherverville, Indiana 46375

Re: 089-11408-00062
First Administrative Amendment to:
Part 70 permit No.: T089-7441-00062

Dear Mr. Muehlman:

Avery Dennison MFD was issued a Part 70 operating permit T089-7441-00062 on July 16, 1999 for a rotogravure printing and pigment and lacquer manufacturing. An application to modify the source was received on August 3, 1999. Pursuant to the provisions of 2-7-11 the permit is hereby administratively amended as follows:

The administrative amendment consists of incorporating the new operation conditions for the proposed two (2) packaging rotogravure printing presses, C-9 and C-11, with two (2) new thermal oxidizer, C-9 and C-11 permitted under the Significant Source Modification SSM 089-11272-00062.

All conditions of the issued Part 70 permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Aida De Guzman, at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
APD

cc: File -Lake County
U.S. EPA, Region V
Lake County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels/Ramesh Tejuja
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT OFFICE OF AIR MANAGEMENT

**Avery Dennison MFD
650 West 67th Avenue
Schererville, Indiana 46375-1390**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7441-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:
Significant Source Modification No.: 089-11272-00062	
Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:
Administrative Amendment No.: 089-11408-00062	Pages Affected: 47 Pages Added: 47a through 47p
Paul Dubenetzky, Chief Permit Branch Office of Air Management	Issuance Date:

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) three-station coater packaging rotogravure printing press, identified as C-9, which has a maximum line speed of 1,500 feet per minute (ft/min), and a maximum printing width of 71 inches;
- (b) One (1) eight-station coater packaging rotogravure printing press, identified as C-11, which has a maximum line speed of 1,500 ft/min, and a maximum printing width of 32 inches and
- (c) Two (2) 15.8 mmBtu/hr thermal oxidizers, identified as C-9 and C-11. Each thermal oxidizer will control the VOC emissions from each press independently.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

General Construction Conditions

- D.6.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

- D.6.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.
- D.6.3 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications pursuant to 326 IAC 2.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.4 Emission Offset [326 IAC 2-3] and Graphic Arts Operations [326 IAC 8-5-5]

- (a) The VOC input usage, including the cleaning wash or solvent from the two (2) rotogravure printing presses, identified as C-9 and C-11, shall be limited before the control to 1,266 tons per 12 month period, rolled on a monthly basis. This limit will give an equivalent volatile organic compound (VOC) potential to emit (PTE) after control of nineteen (19) tons per 12- month period.

During the first twelve (12) months of operation, the press ink, coatings, including the cleaning wash or solvent shall be limited such that the total press ink, coatings including the cleaning wash or solvent divided by accumulated months of operation shall not exceed 105.5 tons per month before control, rolled on a monthly basis.

- (b) The two (2) thermal oxidizers, C-9 and C-11, shall be operated at all times the proposed two (2) rotogravure printing presses, are in operation.
- (c)

- (d) The operating temperature of each thermal oxidizer, identified as C-9 and C-11, shall be maintained at or above the minimums established during the compliance stack tests that will achieve an overall control of 98.5%.
- (e) Compliance with (a), (b) and (c) of this condition will make VOC emissions not to exceed 19 tons per twelve-month and therefore, makes 326 IAC 2-3 Emission Offset Rules not applicable. It also satisfies and exceeds the overall control efficiency requirements in 326 IAC 8-5-5 for Graphic Arts Operations, and the Printing and Publishing NESHAP, 40 CFR 63, Subpart KK.

D.6.5 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-12]

326 IAC 8-1-12 applies only to facilities that use control devices to comply with 326 IAC 8-5-5.

- (a) The two (2) thermal oxidizers, C-9 and C-11 shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAM.
- (b) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAM inspectors.

D.6.6 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart KK.

D.6.7 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR 63, Subpart KK]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of the rule was attached in the issued Title V permit. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999. The overall control efficiency of 98.5% for each oxidizer required to operate presses C-9 and C-11, to stay below the Emissions Offset Significant level for VOC, satisfies the overall efficiency of 95% requirements under this NESHAP.

- (a) The two (2) packaging rotogravure printing presses, C-9 and C-11, shall limit emissions to no more than five (5) percent of the organic HAP applied for the month.
- (b) The Permittee shall demonstrate compliance with this standard by operating capture systems and control devices and demonstrating an overall organic HAP control efficiency of at least ninety-five percent (95%) for each month. The Permittee shall show compliance by demonstrating:
 - (1) Initial compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.6.11 and
 - (2) Continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.6.13
- (c) The facility is in compliance with the ninety-five percent (95%) overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a

common control device:

- (1) The overall organic HAP control efficiency as determined by the procedures in Condition D.6.11 for each press or group of presses served by that control device and a common capture system is equal to or greater than ninety-five percent (95%);
- (2) The oxidizers are operated such that the average combustion temperature is greater than the minimum combustion temperature established in accordance with the provisions of Condition D.6.14 for each three (3) hour period; and
- (3) The average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with the provisions of Condition D.6.14 for each three (3) hour period.

D.6.8 Graphic Arts Operations 326 IAC 8-5-5

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee shall operate an incineration system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water. Also, the Permittee shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system of sixty-five percent (65%). The overall control efficiency of 98.5% required to operate presses C-9 and C-11, to stay below the Emissions Offset Significant level for VOC, satisfies the overall efficiency of 65% requirements under this rule.

D.6.9 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for presses C-9 and C-11, and their respective thermal oxidizer.

D.6.10 Startup, Shutdown, and Malfunction Plan [326 IAC 20-18-1] [40 CFR 63.6(e)(3) General Provisions]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall be developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

- (1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;
- (2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

- (3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).
- (b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.
- (c) Recordkeeping associated with the SSM plan is identified in Condition D.6.16. Reporting associated with the SSM plan is identified in Condition D.6.18.
- (d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAM for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAM, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.
- (e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAM.
- (f) IDEM, OAM shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAM may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAM may require reasonable revisions to a SSM plan, if IDEM, OAM finds that the plan:

- (1) Does not address a startup, shutdown, or malfunction event that has occurred;
 - (2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or
 - (3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.
- (g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

Compliance Determination Requirements

D.6.11 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

- (a) Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test required when the control system became subject to this rule.
- (b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.
- (c) A compliance test shall be performed within ninety (90) days of:
 - (1) Startup of a new coating facility ;
 - (2) Changing the method of compliance for an existing coating facility from compliance coatings or daily-weighted averaging to control devices; or
 - (3) Receipt of a written request from IDEM, OAM or U.S. EPA.
- (d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAM at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures.
 - (2) Operating and control system parameters.
 - (3) Type of VOC containing process material being used.
 - (4) The process and control system parameters that will be monitored during the test.
- (e) All compliance tests shall be conducted according to a protocol approved by IDEM, OAM at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:
 - (1) Test procedures.
 - (2) Operating and control system parameters.
 - (3) Type of VOC containing process material being used.
 - (4) The process and control system parameters that will be monitored during the test.

D.6.12 Testing Requirements [326 IAC 20-18-1] [40 CFR 63.827]

Pursuant to the Printing and Publishing Industry NESHAP, and 326 IAC 8-5-5 (Graphic Arts Operations), initial compliance with the ninety-five percent (95%) overall organic HAP control efficiency requirement in Condition D.6.7 and the sixty-five (65%) overall VOC control efficiency requirement in D.6.8 shall be demonstrated for the two (2) thermal oxidizers within 60 days after

achieving maximum production rate, but no later than 180 days after initial start-up. The overall control efficiency of 98.5% required to operate the thermal oxidizers and presses C-9 and C-11, to stay below the Emissions Offset Significant level for VOC, which satisfies the overall efficiency of 95% required under this NESHAP, and the 65% required under 326 IAC 8-5-5, shall be the level of efficiency for which thermal oxidizers C-9 and C-11 shall be operated and tested for, and the testing shall be in accordance with the following:

- (a) Determine the oxidizer destruction efficiency (E) using the following procedure:
 - (1) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:
 - (i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.
 - (ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.
 - (iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.
 - (iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.
 - (v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.
 - (vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (A) through (C) below. The Permittee shall submit notice of the intended test method to IDEM, OAM for approval along with notice of performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:
 - (A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.6.7, or
 - (B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or
 - (C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^n C_i M W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions) of the rule attached to the issued Title V permit.

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

(2) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(3) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. The Permittee shall establish as the operating parameter the minimum combustion temperature. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.6.7.

(b) Determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.6.7 by conducting a performance test. For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(c) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:

$$R = EF / 100$$

where E and F are determined according to paragraphs (a) and (b) of this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.6.13 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5 °C), whichever is more accurate.

D.6.14 Monitoring Requirements [326 IAC 20-18-1] [40 CFR 63.828]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance tests of C-9 and C-11 thermal oxidizers are completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each thermal oxidizer required to comply with Condition D.6.7 to ensure proper operation and maintenance by implementing the following requirements:

- (a) For the oxidizers, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ± 1 percent of the temperature being monitored in °C or ± 1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.
- (b) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.
- (c) To demonstrate continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, the Permittee shall:
 - (1) Submit to IDEM, OAM with the compliance status report required in Condition D.6.18(b), a plan that:
 - (i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;
 - (ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance; and
 - (iii) Identifies the specific monitoring procedures.
 - (2) Set the operating parameter value, or range of values, that demonstrate compliance with Condition D.6.7; and
 - (3) Conduct monitoring in accordance with the plan submitted to IDEM, OAM unless comments received from IDEM, OAM require an alternate monitoring scheme.

- (d) Any excursion from the required operating parameters that are monitored in accordance with this condition, unless otherwise excused, shall be considered a violation of Condition D.6.7.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.15 Record Keeping Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day for each coating facility:

- (a) The name and identification of each coating used at each coating facility.
- (b) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.
- (c) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.
- (d) The required overall emission reduction efficiency for each day for each coating facility.
- (e) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.6.11.
- (f) Control device monitoring data as follows:
 - (1) Continuous records of the temperature in the gas stream in the combustion zone of each incinerator.
 - (2) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in each combustion zone was more than fifty degrees Fahrenheit (50 °F) (twenty-eight degrees Centigrade (28 °C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.
- (g) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.
- (h) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.
- (i) The records required in paragraphs (a) through (h) of this condition shall be maintained in accordance with the requirements of Condition C.20 of the issued Part 70 permit and 326 IAC 8-1-9(c).

D.6.16 Record Keeping Requirements [326 IAC 20-18-1] [40 CFR 63.829]

- (a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

- (1) Records of all measurements needed to demonstrate compliance with Condition D.6.7. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:
 - (i) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);
 - (ii) The occurrence and duration of each malfunction of the air pollution control equipment;
 - (iii) All maintenance performed on the air pollution control equipment;
 - (iv) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.6.10;
 - (v) All information necessary to demonstrate conformance with the SSM plan required in Condition D.6.10 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or recordkeeping, in order to minimize the recordkeeping burden for conforming events);
 - (vi) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);
 - (vii) All required measurements needed to demonstrate compliance with Condition D.6.7 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);
 - (viii) All results of performance tests and CMS performance evaluations;
 - (ix) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;
 - (x) All CMS calibration checks;
 - (xi) All adjustments and maintenance performed on CMS;
 - (xii) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

- (2) Records for each applicability determination performed by the Permittee in accordance with the requirements of 40 CFR 63.820(a) of this rule. The records and conditions for recordkeeping are specified in 40 CFR 63.10(b)(3) (General Provisions) and are as follows:
- (i) If the Permittee determines that their stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to 40 CFR 63, Subpart KK, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first.
 - (ii) The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow IDEM, OAM to make a finding about the source's applicability status with regard to the relevant standard or other requirement.
 - (iii) If relevant, the analysis shall be performed in accordance with requirements established in this rule for this purpose. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Federal Clean Air Act, if any.
- (3) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.6.14. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:
- (i) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);
 - (ii) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;
 - (iii) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);
 - (iv) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;
 - (v) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;
 - (vi) The nature and cause of any malfunction (if known);

- (vii) The corrective action taken or preventive measures adopted;
 - (viii) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;
 - (ix) The total process operating time during the reporting period; and
 - (x) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).
 - (xi) In order to satisfy the requirements of paragraphs (vi) through (viii) of this condition and to avoid duplicative recordkeeping efforts, the Permittee may use the SSM plan or records kept to satisfy the recordkeeping requirements of the SSM plan specified in Condition D.6.16, provided that such plan and records adequately address the requirements of paragraphs (vi) through (viii) of this condition.
- (b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):
- (1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.
 - (2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.
 - (3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.6.17 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall notify IDEM, OAM in either of the following instances:

- (a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAM within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:
- (1) Name and location of the coating facility.
 - (2) Identification of the control system where the noncompliance occurred and the coating facility it served.
 - (3) Time, date and duration of the noncompliance.
 - (4) Corrective action taken.

- (b) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

D.6.18 Reporting Requirements [326 IAC 20-18-1] [40 CFR 63.830]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

- (a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAM require monitoring of an alternate parameter.
- (b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions).
- (c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).
- (d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).
 - (i) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.6.10, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAM; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).
 - (ii) Separate start-up, shutdown, or malfunction reports are not required if the

information is included in the report specified in paragraph (e) of this condition.

- (e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standard in Condition D.6.7.
- (f) The monitoring plan required in Condition D.6.14(c), to ensure continuous capture efficiency compliance, submitted with the compliance status report required in paragraph (b) of this condition.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA
Part 70 Significant Source Modification Quarterly Report**

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana
Mailing Address: 650 West 67th Avenue, Schererville, Indiana
Source Modification No.: 089-11272-00062
Facility: Two (2) rotogravure printing presses, C-9 and C-11
Parameter: Volatile Organic Compounds (VOC)
Limit before control: 1,266 tons/12-month period, rolled on a monthly basis

YEAR: _____

Facility	Month 1			Month 2			Month 3		
	This Month, Input VOC Usage Before Control	Previous 11 Months Input VOC Usage Before Control	12 Month Total Input VOC Usage Before Control	This Month, Input VOC Usage Before Control	Previous 11 Months Input VOC Usage Before Control	12 Month Total Input VOC Usage Before Control	This Month, Input VOC Usage Before Control	Previous 11 Months Input VOC Usage Before Control	12 Month Total Input VOC Usage Before Control
Press C-9									
Press C-11									

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 SOURCE MODIFICATION
CERTIFICATION**

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana
Mailing Address: 650 West 67th Avenue, Schererville, Indiana
Source Modification No.: 089-11272-00062

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this approval.

Please check what document is being certified:

- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT
CERTIFICATION**

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature: _____

Printed Name: _____

Title/Position: _____

Date: _____

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: Avery Dennison
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062

This form consists of 2 pagesPage 1 of 2

Check either No. 1 or No.2

- 9** 1. This is an emergency as defined in 326 IAC 2-7-1(12)
C The Permittee must notify the Office of Air Management (OAM), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
- 9** 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c)
C The Permittee must submit notice in writing within ten (10) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____